

**GTPC** GARY TSIRELMAN P.C.

ATTORNEYS & COUNSELORS AT LAW

Gary TSIRELMAN, M.D.  
AUSTEN UGWECHES

Darya KLEIN  
Selina CHIN  
David GOTTLIEB

Stefan BELINFANTI  
Ilya MURAFI  
Nicholas BOWERS  
Sebastian MELO  
Joseph PADRUCCO

129 LIVINGSTON STREET  
SECOND & THIRD FLOORS  
BROOKLYN, NY 11201  
T: (718) 438-1200 • F: (718) 438-8883  
nbowers@gtmdjd.com

Douglas MACE  
Jennifer RAHEB  
Evan POLANSKY  
Jung PRYJMA

April 3, 2025

VIA THE ECF:

Honorable Magistrate Judge Robert M. Levy,  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Roosevelt Road Re, Ltd., et al. v. Liakas Law P.C., et al* 25-cv-300 RML;  
Request For An Enlargement of Time**

Your Honor:

We represent Defendants Richard Apple, MD, Big Apple Pain Managemnt, PLLC, Brooklyn Medical Practice, PC, Todd Lawrence Lebson DC, North Shore Family Chiropractic, PC, Sayeedus S. Salehin, MD, Unicorn Acupunture, PC, Dekun Wang, L.Ac., (collectively, "GTPC Defendants"). We write to respectfully request an **enlargement of time (of 30 days)** pursuant to your Honor's Individual Rules (Section 2.A & 2.E) for the GTPC Defendants to answer, move or otherwise respond to the Complaint in this action from April 7, 2025 to May 7, 2025. The reason for the request is that we were recently retained and in light of our heavy workload, multiple clients and the upcoming Jewish holidays we would need some extra time to meet, confer and conduct some preliminary investigations in the within matter in order to be able to respond effectively. No prior applications for enlargement of time had been made. Plaintiffs have kindly consented to this request.

We thank the Court for its attention to this matter.

Respectfully,

/s/Austen Ugweches, Esq.

For Gary Tsirelman P.C.,  
Attorneys For GTC Defendants,  
129 Livingston, 2<sup>nd</sup> Floor  
Brooklyn NY 11201  
Phone: 718-438-1200.